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# WGBM / 94.7 FM

Before the FEDERAL COMMUNICATIONS COMMISSION Washington DC 20554

In the Matter of

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Petition for a Microstation Radio Broadcasting Service  
Proposal for Creation of the Low Power FM (LPFM) Broadcast Service

RM No. 9208

RM No. 9242

Comments of WGBM (FM) Mishicot, Wisconsin  
Bay-Lakes-Valley Broadcasters, Inc.  
(Green Bay, Appleton, Manitowoc markets)

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APR 16 1999

It is difficult for me to put into words my fear that this proposal will horribly damage the integrity of radio broadcasting. In our area, dozens of new Low Power radio stations might be added. The interference factor alone to existing services and even these future services will make FM radio UNLISTENABLE in many areas.

Much of FM radio listening is done IN THE CAR. A radio station's signal rises and falls as a vehicle travels down a road. Anytime that there is one of these low power stations nearby there will be interference to mobile listening. The prospect of in-car listeners receiving consistent FM reception over a wide area from radio stations will be a thing of the past.

The FCC's proposed actions on low power FM is the same mistake that the Commission previously made to the AM band. The FCC recognizes its mistake on the AM band. It should not repeat that mistake in the FM band.

The Citizens Band (CB) Radio Service was literally destroyed by people using "kickers" and other high power devices which caused an interference level that chased away the normal user. The FCC was unable to "police" these few hundred "power users". How will they "police" thousands of new FM radio stations trying to "sound" bigger and bolder?

The harm that accrued to local radio from Docket 80-90 will also be repeated if thousands of additional stations are put on the FM band. While economic harm should not perhaps be a concern of the government, harm to the transmission of local emergency information should be, and that purpose of local radio may be irreparably harmed if low power stations are thrown in across the FM band.

The Commission has said for years that low power FM stations are an inefficient use of FM spectrum. About thirty years ago, it tried to do away with all of the 10 watt non-commercial college stations, stating that they were an inefficient use of the spectrum. What has now changed that now makes such low power stations an efficient use of the spectrum?

I am alarmed by these proposals for what it will do to the ability of their radio listeners to receive consistent, predictable reception of their radio stations.

Respectfully submitted,

  
Philip J. Robbins, President

Bay-Lakes-Valley Broadcasters, Inc.

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